

SJ-EXHIBIT 35

EXHIBIT 12: STRENGTH OF OPIOIDS DISPENSED AT PHARMACIES IN LAKE AND TRUMBULL COUNTIES

January 1, 2008 - December 31, 2018

	All Formulations				Oral Solids ^[1]	
	MME per Transaction	Days Supplied per Transaction	MME per Day	Share of Transactions with MME/Day ≥ 200	MME per Dosage Unit	Share of Transactions with MME/DU ≥ Oxycodone 30mg ^[2]
<i>All Lake and Trumbull Pharmacies</i>	1,047	17	60	4.13%	14	5.80%
<i>Non-Defendant Pharmacies</i>	1,323	18	76	7.46%	17	9.26%
<i>Defendant Pharmacies</i>	936	17	54	2.81%	13	4.49%
[3]	2,926	24	124	22.49%	26	25.39%
[4]	2,422	23	106	16.26%	26	22.32%
	652	16	42	1.03%	10	1.75%

Notes:

[1] Oral solids make up 93% of all at-issue opioid transactions at Lake and Trumbull pharmacies.

[2] Oxycodone 30mg is associated with an MME per dosage unit of 45. Pills of Oxycodone 30mg strength and above were identified by the Lake County Narcotics Agency as the most trafficked prescription pills in Lake County. Damien Blakeley Dep. 94:17-95:14, Dec. 7, 2020 (Explaining that as a LCNA and DEA diversion investigator the majority of his pill buys were for “30-milligram oxycodone” and that although he did investigate other pill types the “30-milligram [oxycodone] has been the most popular for a while,” noting that preceding the Oxy-30’s popularity “in 2009, Oxy 80s were very popular.”) see also id. 19:13-18 (Explaining that oxycodone has been the most commonly trafficked pill in Lake County “all of my 11 years”). Plaintiff’s expert witness, James Rafalski agreed at deposition that “oxycodone 30 [is] more likely to be diverted than lower strengths of oxycodone” explaining that this testimony is “based on my experience in the cases I worked on.” James E. Rafalski Dep. Volume 2, 437:3-438:5, May 14, 2019.

[3] The OARRS dataset does not report dispensing transactions for [REDACTED] (DEA #BP2611487) after January 15, 2011. The state of Ohio permanently revoked the pharmacy licenses of [REDACTED] owner of [REDACTED], and two employees, [REDACTED] and [REDACTED], in October 2011. The pharmacy is now under new ownership. See [REDACTED] May 12, 2013, accessed at [REDACTED]

[4] McKesson stopped distributing controlled substances to [REDACTED] beginning between May and August 2015. See [REDACTED]

Source: Ohio Board of Pharmacy’s Production of OARRS data; At-Issue NDC List, “Pharmacy Defendants’ NDC List.xlsx,” Plaintiffs’ Nationwide ARCOS dataset, “ARCOS US 14 Drugs Nov 2020.csv”, CDC MME dataset, “CDC_Oral_Morphine_Milligram_Equivalents_Sept_2018.xlsx”; [REDACTED] Answers To Interrogatories Nos. 1, 2, 3, 6, And 8 of Plaintiffs (First) Combined Track Three Interrogatories To Chain Pharmacy Defendants, July 13, 2020; National Address Database, U.S. Department of Transportation, October 29, 2020, available at <https://www.transportation.gov/gis/national-address-database/national-address-database-nad-disclaimer>; Google Geocoding API (via R ggmap package).